



TETRA TECH FW, INC.

December 21, 2004
FWHN-FTMC-04-0193

Ms. Lydia Tadesse
Contracting Officer
US Army Engineering and Support Center, Huntsville
P.O. Box 1600
Huntsville, AL 35807

SUBJECT: Final Site-Specific Work Plan for OE Site Characterization for M1.01 Parcel and M3 Miscellaneous Properties, Task Order 0001, Ordnance and Explosive Response at Fort McClellan, Alabama, Contract Number DACA87-99-D-0010

Dear Ms. Tadesse:

Tetra Tech FW, Inc. is pleased to submit the Final Site Specific Work Plan for OE Site Characterization for M1.01 Parcel and M3 Miscellaneous Properties (Task 3, Task order 0001). Copies are provided in accordance with the attached distribution list and the Scope of Work.

If you have any questions, concerning this submission please contact Todd Biggs, Task Order Manager, or me at (256) 820-7904.

Sincerely,

Arthur B. Holcomb, P.E.
Project Manager

Enclosures, as stated

CF: See Distribution List



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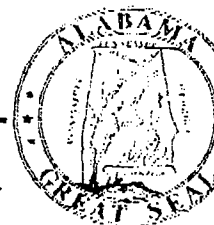
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December 10, 2004

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Mr. Ronald M. Levy
BRAC Environmental Coordinator
Environmental Office, 291 Jimmy Parks Blvd.
U.S. Army Garrison
Fort McClellan, Alabama 36205

RE: ADEM Review Comments: Draft-Final Site Specific Work Plan OE Site Characterization for the M1.01 and M3 Miscellaneous Properties on Fort McClellan, dated December 2004; and the outstanding submittal entitled Final Site Specific Final Report M1.01 Parcel and M3 Miscellaneous Property Fort McClellan, Alabama, dated March 2003.
Fort McClellan, Alabama
Facility ID No. AL4 210 020 562
DSMOA Project No. 2525-223-0445

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the subject workplan addressing the remaining Ordnance and Explosives (OE) work necessary to complete the characterization of the M1.01 and M3 land parcels at Fort McClellan. This letter presents ADEM's review comments on this most recent submittal.

ADEM began its review of the Final Site Specific Final Report M1.01 Parcel and M3 Miscellaneous Property Fort McClellan, Alabama some time ago. As a result of DSMOA funding deficiencies and other pending unexploded ordnance issues, ADEM was unable to complete its review and issue a letter citing specific comments. However, ADEM was able to summarize its comments for the Army's benefit in order to expedite the resolution of these parcels. On October 13, 2004, ADEM met with representatives of the Army to discuss what could be done to help resolve ADEM's outstanding concerns regarding insufficient characterization and quality control issues related to historical UXO work at the M1.01 and M3 parcels. The purpose of this meeting was to determine what amount of additional work may be required to resolve ADEM's concerns regarding UXO issues at these parcels. The Army's submittal of the subject December 2004 workplan resulted as an action item from the October 13, 2004 meeting.

The Department's comments on the December 2004 workplan are intended to resolve any remaining UXO concerns at these parcels and hence, to resolve the Final Site Specific Final Report M1.01 Parcel and M3 Miscellaneous Property Fort McClellan, Alabama, March 2003 report. The Department's comments are presented as an attachment to this letter.

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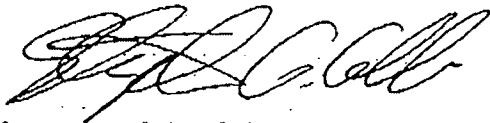


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DEC 10 2004
Mr. Ron Levy
December 10, 2004

Should you have any questions, contact Mr. David Bush at (334) 271-7789 or via e-mail at cdb@adem.state.al.us.

Sincerely,



Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

SAC/JWG/DB/mal

Attachment

cc: Mr. Dan Cleckler/Joint Powers Authority
Ms. Shana Decker/ADEM
Mr. Jim Grassiano/ADEM
Ms. Miki Schneider/JPA
Mr. LaBarron Rudolph/ADEM
Ms. Brandi Little/ADEM

File: Land Div/Hazardous Waste/Fort McClellan/AL4210020562/Correspondence/2004

ADEM Review Comments
Draft Final Site Specific Work Plan OE Site Characterization for
M1.01 and M3 Miscellaneous Properties, dated December 3, 2004
Fort McClellan, Alabama

Comments

1. Fort McClellan states that the main objective of this Task Order is to investigate six grids to evaluate the appropriateness of the one foot clearance (paragraph 1.2.1 and 1.2.1) completed in July 2002. The statement of objective should be clarified to indicate that: "The Task Order is intended to demonstrate to ADEM that a one foot clearance was an appropriate UXO remedy. ADEM is requesting the work outlined in this Task Order because the one foot clearance is presently based on the Army's assumption that all UXO are present in the top one foot of soil and this Task Order will provide a more in-depth look at the potential for UXO to be present at depths greater than one foot. The Task Order will yield an intrusive investigation to confirm whether or not there are any UXO items present at any depth within the six identified grids."
2. Throughout the document (e.g., paragraphs 4.1.2 and 6.3.2), the Army indicates that its contractors may work under the assumption that there is presently believed to be no threat of encountering a UXO item. The submittal should be revised to state that the potential exist for encountering a UXO item. Therefore, all personnel should be briefed on the possibility of encountering OE/UXO items while performing field work on this job. The revised plan should reference the need for daily safety briefings.
3. The Army states that a geophysical prove out (GPO) will not be performed (paragraph 2.4.1) but that it will perform daily testing of its geophysical system via a test grid. The Department requests specific information about the proposed or existing geophysical test grid. Specifically, please clarify how the test grid will be used to ensure the collection of accurate geophysical data and how the test grid may be used, if applicable, to aid in identifying a proposed list of anomalies that are to be reacquired (i.e., how this information will aid the geophysicists to accurately interpret the data).
4. ADEM requests that the geophysical data be provided to ADEM for the six grids and that ADEM have an opportunity to review the proposed list of anomalies that are to be re-acquired. The Department requests that the Army provide both the raw geophysical data and the corrected data in the final report (paragraph 6.13.2).
5. The Army states that the size of the target item(s) should be between 37mm round and a 3 inch Stokes Mortar (paragraph 6.2.1). The basis of this proposed requirement is unclear and unacceptable to ADEM. The appropriate target item(s) should be 20mm or greater as well as any other munition historically fired at Fort McClellan during range training.
6. Please clarify the duties of the site geophysicists and the home office geophysicists (paragraph 6.12.1 and 6.12.2).

Note: For the intrusive investigation of the M1.01 and M3 properties, the Department anticipates that, after the geophysical team selects the anomalies for intrusive investigation, the geophysicists will then select an additional percentage (perhaps 10 percent, but this is to be determined) of the total recorded anomalies for intrusive investigation. The additional anomalies shall be chosen based on lower priority signals, whose origin may be unknown and/or questionable. The complete anomaly selection of these six grids will aid in demonstrating the validity of the UXO status of the entire M1.01 and M3 parcels and hence provide supportable evidence of the reliability of the test grid and overall geophysical test system.

Response to ADEM Review Comments
Draft Final Site Specific Work Plan for OE Characterization for
M1.01 Parcel and M3 Miscellaneous Properties

1. Concur. The objective within this work plan will be changed as requested by ADEM to indicate that the Task Order is intended to demonstrate to ADEM that a one foot clearance was an appropriate UXO remedy for this area.
2. It is the Army's position that the M1.01 Parcel and M3 Miscellaneous Properties have been cleared in an appropriate manner and a signed statement of clearance has been issued. The teams working in this area have all had the base safety briefing that ensures all personnel understand that this was an Army base and UXO items could be found anywhere. In addition, all personnel doing the intrusive work under this task will be UXO qualified personnel. The site wide work plan requires a daily safety brief (referenced in this site specific work plan) and it will be carried out every morning at 6:00 A.M. prior to going to the field.
3. The purpose of a Geophysical Prove-Out (GPO) is to select the equipment to use in a geophysical survey. In this case we have proven that the best instrument for this work is the EM-61. What we intend to do is to validate that the system works using the existing test grid as the basis for this test. The actual equipment to be used (EM-61 and Constellation) and the team members will all be validated through this test prior to any data being collected in the M1.01 Parcel and M3 Miscellaneous Properties. The site geophysicist will process the data from the test grid, compare the results to the known items in the grid and determine if the equipment and team are working properly. Once he has determined this is occurring the team will begin the process of geophysically surveying the six grids in the M1.01 Parcel and M3 Miscellaneous Properties. The Army will provide the data collected at the test grid as well as the information of known items within the test grid for a comparison in the final report.
4. It is the contractors intent to begin reacquire and intrusive operations as soon as possible after the geophysical data is available from the geophysicist. ADEM is encouraged to have a representative present during all phases of this process and will be provided the data as it is available, however, the contractor will not wait for input from ADEM to continue with reacquire and intrusive operations. The contractor will also provide all raw geophysical data on CD to ADEM after the field work is completed.
5. The failure criteria of a 37mm to 3 inch Stokes was chosen based on a review of historical uses of the area and the data collected around the M1.01 Parcel and M3 Miscellaneous Properties. This included data from the ASR, the Eastern Bypass EE/CA, the M2 Parcel and the previous one foot clearance in the M1.01 Parcel and M3 Miscellaneous Properties. A database search has shown that no 20mm have been found on Ft. McClellan to date and historically were not used on this installation.
6. Concur. Will add verbiage to explain the duties of the site and home office geophysicists.

Note: Concur. The contractor will randomly select 10% of all "no dig" anomalies for excavation. The anomalies will be picked by the database manager. Neither the intrusive team or the site geophysicist will have knowledge that these picks were made until after the intrusive results are reported.

<input type="checkbox"/> SITE DEV & GEO	<input type="checkbox"/> MECHANICAL	<input type="checkbox"/> SAFETY	<input type="checkbox"/> SYSTEMS ENG	REVIEW DATE NAME	Draft Final Site Specific WP for M1.01 9 DEC 04 Suzanne Murdock
<input type="checkbox"/> ENVIR PROT& UTIL	<input type="checkbox"/> MFG TECHNOLOGY	<input type="checkbox"/> ADV TECH	<input type="checkbox"/> VALUE ENG		
<input type="checkbox"/> ARCHITECTURAL	<input type="checkbox"/> ELECTRICAL	<input type="checkbox"/> ESTIMATING	<input type="checkbox"/> OTHER		
<input type="checkbox"/> STRUCTURAL	<input type="checkbox"/> INST & CONTROLS	<input type="checkbox"/> SPECIFICATIONS			

ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
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1.	General	Concur with responses assuming all anomalies detected within the target box are selected and dug, not just those believed to be below 1 foot.	Concur
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ACTION CODES
A - ACCEPTED/CONCUR
D - ACTION DEFERRED
W - WITHDRAWN
N - NON-CONCUR
VE - VE POTENTIAL/VEP ATTACHED

DESIGN REVIEW COMMENTS

PROJECT M1.01 and M3 Miscellaneous Properties on Ft. McClellan, AL 104ALFTMC01SAM

<input type="checkbox"/> SITE DEV & GEO	<input type="checkbox"/> MECHANICAL	<input type="checkbox"/> SAFETY	<input type="checkbox"/> SYSTEMS ENG	REVIEW DATE NAME	Back check of SSWP 12-09-04 S: 13 Dec 04 Randall M Kaehne/OES/759-0429
<input type="checkbox"/> ENVIR PROT& UTIL	<input type="checkbox"/> MFG TECHNOLOGY	<input type="checkbox"/> ADV TECH	<input type="checkbox"/> VALUE ENG		
<input type="checkbox"/> ARCHITECTURAL	<input type="checkbox"/> ELECTRICAL	<input type="checkbox"/> ESTIMATING	<input type="checkbox"/> OTHER		
<input type="checkbox"/> STRUCTURAL	<input type="checkbox"/> INST & CONTROLS	<input type="checkbox"/> SPECIFICATIONS			

ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
1.	Para 4.1.2 & Appx G	<p>A Statement of Clearance from USACE based on a previous clearance does not claim or guarantee that 100 percent of hazardous OE/UXO CWM has been removed from the area. The previous clearance was to a depth of one foot. Intrusive investigation on this site will be through and below the one foot depth. It is possible that OE/UXO/CWM was not detected during the previous clearance and remains in the first one foot.</p> <p>A Most Probable Munition (MPM) needs to be established and all associated references need to be added to this SSWP.</p>	Work zone with exclusion requiring visitor clearance has been established.
2.	Para 6.2.1 & Para 11.2.4.1	The acceptance criteria is in accordance with the current SOW.	

ACTION CODES
A - ACCEPTED/CONCUR
D - ACTION DEFERRED
W - WITHDRAWN
N - NON-CONCUR
VE - VE POTENTIAL/VEP ATTACHED

DESIGN REVIEW COMMENTS

PROJECT CN 12-031-04, Ft. McClellan, M1.01 Parcel, WP for Confirmatory Investigation

<input type="checkbox"/> SITE DEV & GEO	<input type="checkbox"/> MECHANICAL	<input type="checkbox"/> SAFETY	<input type="checkbox"/> SYSTEMS ENG	REVIEW	Final
<input type="checkbox"/> ENVIR PROT & UTIL	<input type="checkbox"/> MFG TECHNOLOGY	<input type="checkbox"/> ADV TECH	<input type="checkbox"/> VALUE ENG	DATE	13 December 2004
<input type="checkbox"/> ARCHITECTURAL	<input type="checkbox"/> ELECTRICAL	<input type="checkbox"/> ESTIMATING	<input type="checkbox"/> OTHER	NAME	Michelle Crull, PhD, PE (256) 895-1653
<input type="checkbox"/> STRUCTURAL	<input type="checkbox"/> INST & CONTROLS	<input type="checkbox"/> SPECIFICATIONS			

ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
1	QC/QA Failure	<p>I understand that the SOW says "The QC failure criteria for this area shall be any item below a depth of 1 foot that meets the specified target item size of between a 37 mm and a 3" Stokes mortar." However, this is really the criteria for determining that the previous 1 foot clearance was not sufficient. From a work standpoint, if the QC/QA process finds any such item within the standard geophysical envelope, it is a failure of the investigation process. This needs to be considered.</p> <p>All other previous comments have been incorporated.</p>	Concur - No changes in Work Plan required.

ACTION CODES W - WITHDRAWN
A - ACCEPTED/CONCUR N - NON-CONCUR
D - ACTION DEFERRED VE - VE POTENTIAL/VEP ATTACHED